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TODAY'S DATE: August 19, 1994

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TRANSMITTAL TO:

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August 19, 1994

VIA TELECOPY AND REGULAR MAIL

Marie M. Rongone, Esq.
Assistant Regional Counsel
United States Environmental
Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Re: Pacific Airmotive Corporation;
San Fernando Valley Area 1,
Burbank Operable Unit
May 4, 1994 Special Notice

Dear Ms. Rongone:

I am writing on behalf of Pacific Airmotive Corporation ("PAC") in response to your July 28, 1994 letter and our recent telephone conference regarding EPA's May 4, 1994 Special Notice Letter for the Burbank Operable Unit of San Fernando Valley Area 1. EPA has requested that PAC make a good faith offer to conduct the long-term operation and maintenance for the Burbank Operable Unit treatment and blending facilities, and agree to pay certain EPA response costs associated with the Burbank Operable Unit.

As we discussed during our telephone conference, PAC is aware of no evidence linking it to the regional groundwater contamination, even after years of investigative efforts which it has conducted at the direction of the State Water Control Board. Nonetheless, PAC agreed to conduct a soil gas and groundwater investigation of its facility pursuant to a CERCLA § 106 Order in an effort to resolve any remaining concerns on the part of EPA. In light of PAC's agreement to conduct the additional investigation, it was surprised to receive EPA's May 4 letter, which appears to pre-judge PAC's liability even before the results of the investigation are in.

Although only preliminary data is presently available from the soil gas investigation at PAC, I understand from PAC's consultants that the results appear to confirm prior data showing that any trichloroethene or tetrachloroethene soil contamination at the facility is surficial in nature and wholly unrelated to the regional groundwater problem. Moreover, I further understand that these preliminary results are consistent with PAC's long-

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Page 2

stated position that any such contamination has migrated from upgradient sources on the neighboring Lockheed property.

Notwithstanding the foregoing, PAC is certainly willing to meet with EPA and the Department of Justice to discuss these issues. Please let me know when you would like to schedule such a meeting.

Very truly yours,

Jerome C. Muys, Jr.
Jerome C. Muys, Jr.